BRONSTEIN, GEWIRTZ & GROSSMAN, LLC Yitzchak Eliezer Soloveichik 60 East 42nd Street, Suite 4600 New York, New York 10165 (212) 697-6484 soloveichik@bgandg.com Attorneys for the Claimants identified on Exhibit A annexed hereto

| UNITED STATES BANKRUPTCY COURT | |
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| EASTERN DISTRICT OF NEW YORK | |
| | |

In re:

WILLOUGHBY ESTATES LLC, : Case No.: 19-45886 (CEC)

Debtor, : Chapter 11

CLAIMANTS' STATEMENT IN SUPPORT OF PLAN CONFIRMATION AND JOINDER IN DEBTOR'S RESPONSE TO CONFIRMATION OBJECTION

The Claimants identified on Exhibit A annexed hereto ("Claimants"), through their undersigned counsel, except as qualified below, (1) join in the Response to Confirmation Objection (ECF No. 116) filed by Debtor Willoughby Estates LLC (the "Debtor"); (2) oppose the Objection of CSRE, LLC and Yechezkel Strulovitch to Combined Disclosure Statement and First Amended Plan of Liquidation (ECF No. 109), which the Court should overrule; and (3) express their support in favor of confirmation of the Debtor's Combined Disclosure Statement and First Amended Plan of Liquidation, dated March 29, 2020 (ECF No. 99-2). Notwithstanding the foregoing, Claimants do not accede to any limitation, qualification, or subordination of their claims other than the subordination of their claims to unsecured claim #3 of Silvercup

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Scaffolding I LLC filed against the Debtor in this case. This qualification, however, poses no obstacle to the confirmation of the Debtor's plan of liquidation.

Dated: New York, New York May 18, 2020

BRONSTEIN, GEWIRTZ & GROSSMAN, LLC

By: /s/ Yitzchak Eliezer Soloveichik
Yitzchak Eliezer Soloveichik (YS3684)
60 East 42nd Street, Suite 4600
New York, New York 10165
(212) 697-6484
soloveichik@bgandg.com
Attorneys for the Claimants identified
on Exhibit A annexed hereto

EXHIBIT A

| INDIVIDUAL CLAIMANTS |
|--------------------------------|
| 1. Angel, Boruch |
| 2. Baddiel, Dovid |
| 3. Baddiel, Hannah |
| 4. Ball, Alex |
| 5. Bamberger, Maurice |
| 6. Bamberger, Meir |
| 7. Ben-David, Yechiel |
| 8. Benedikt, Nomi |
| 9. Benedikt, Yosef Zvi |
| 10. Ben-Shimon, Yaakov |
| 11. Ben-Zimra, Avraham |
| 12. Ben-Zimra, Rachel |
| 13. Berenshtein, Shlomo Zalman |
| 14. Biedermann, Michael |
| 15. Binyamini, Efraim |
| 16. Biton, Yehudit |
| 17. Brandwein, Moshe Yom Tov |
| 18. Cohen, Israel Meir |
| 19. Cohen-Arazi, Netanel |
| 20. Daskal, Shlomo Pinchas |
| 21. Elias, Sholom Mordechai |
| 22. Elkaim, Isaac |
| 23. Elkaim, Jakob |
| 24. Elkaim, Raphael Barouch |
| 25. Ernster, David Dov |
| 26. Fischer, Samuel |
| 27. Frenkel, Batsheva |
| 28. Gabai, Shmuel |
| 29. Galinsky, Elimelech |
| 30. Gelber, Moshe Chaim |
| 31. Geller, Anthony |
| 32. Glatstein, Yosef |
| 33. Goldman, Ester |
| 34. Goldschmied, Gabriel |
| 35. Grinfeld, Chezkel |
| 36. Groskopf, Pinchas |
| 37. Gross, Nathan |
| 38. Grossnass, Abraham Joshua |
| 39. Gutman, Yisrael David |

| 40 Halman Dinamin Mandachai |
|---------------------------------|
| 40. Halpern, Binyomin Mordechai |
| 41. Halpern, David |
| 42. Halpern, Ya'akov Mordechai |
| 43. Hertzig, Yedidya |
| 44. Hirsch, Israel |
| 45. Hirsch, Tzivia |
| 46. Hirsch-Grunwald, Yvonne |
| 47. Honigsberg, Shmaryahu |
| 48. Itzkowitch, Raizl |
| 49. Jaffe, Esther Selma |
| 50. Jaffe, Gavriel Aryeh |
| 51. Jelen, Debra Gail |
| 52. Kahn, Pinchos |
| 53. Kahna, Haim Shmuel |
| 54. Kaplan, Israel J |
| 55. Katabi, Yinon |
| 56. Keyak, Rachel Bracha |
| 57. Klein, Elisheva |
| 58. Kohen, Hinda |
| 59. Koninski, Isaac |
| 60. Kraus, Moshe Bunim |
| 61. Kruskal, Dina Dvora |
| 62. Kruskal, Yisrael Meir |
| 63. Lavkovitch, Yechiel |
| 64. Lev, Miriam Chaya |
| 65. Lev, Avraham Yeshayahu |
| 66. Levi, Oved |
| 67. Levin, Yaakov |
| 68. Lichtig, Benzion |
| 69. Maimon, Simha |
| 70. Maimon, Yosef |
| 71. Masher, Meshulem |
| 72. Merel, Yakov Israel |
| 73. Merl, Ely |
| 74. Meyer, Mordechai Yaakov |
| 75. Meyer, Sara |
| 76. Michael, Elhanan |
| 77. Motzen, Hana |
| 78. Mozgo, Gavriel |
| 79. Muller, Michael |
| 80. Neufeld, Pinhas Dov |
| 81. Ollech, Burech |
| 82. Ollech, Duvid |
| 83. Ollech, Heini |
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| 0.4 0.11 | lach Talrah |
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| | lech, Jakob |
| | lanchik, Mordechai Zeev |
| | skas, Abraham |
| | sen, Daniel |
| | bnitz, Haim Menachem |
| | ness, Rivka |
| | hmerler, Naftali Zvi |
| | honberg, Benjamin |
| | honberg, Bertha Sara |
| | honberg, Jacob |
| | hwarz, Abraham J. |
| 95. Scl | hwarz, David Meir |
| 96. Sh | apiro, Chaim Bezalel |
| 97. Sh | aya, Itamar |
| 98. Sh | enker, Shimon |
| 99. Sh | lezinger, Elazar David |
| 100. | Shlezinger, Yosef Shlomo |
| 101. | Shlomo, Avishai Mishael |
| 102. | Shtauber, Avinoam |
| 103. | Shtauber, Malka |
| 104. | Shtern, Yossef |
| 105. | Siata Dishmaya LLC |
| 106. | Spitzer, Abraham |
| 107. | Spingarn, Ishak Aron |
| 108. | Spingarn, Lionel |
| 109. | Stein, Fishel |
| 110. | Stein, Menachem |
| 111. | Stein, Moshe |
| 112. | Stein, Moshe David |
| 113. | Stein, Netanel |
| 114. | Steinhaus, Debora Sara |
| 115. | Stern, Shifra |
| 116. | Stern, Yosef Shimon |
| 117. | Stern, Zvi |
| 118. | Stewart, Rachel |
| 119. | Stewart, Samuel |
| 120. | Strasser, David Shalom |
| 121. | Veichelder, Zevulun |
| 122. | Vinberg, Abraham |
| 123. | Weil, Elyashiv Menachem |
| 124. | Weingold, Yisrael Meir |
| 125. | Weiniger, Moshe Dovid |
| 126. | Weisman, Yosef Zvi |
| 120. | Weiss, Meir |
| 14/. | vv C133, 1V1C11 |

| 128. | Winegarten, Yehuda |
|------|----------------------------|
| 129. | Wizman, Yaakov |
| 130. | Yitshaki, David |
| 131. | Zakuta, Avraham |
| 132. | Zelivansky, Yehoshua Natan |
| 133. | Ryness David |
| 134. | Stern Eliyahu |

| LLC | CLAIMANTS |
|-----|--------------------------------------|
| 1. | Bergen Operations LLC |
| 2. | Bushwick Operations LLC |
| 3. | 1285 Bushwick Operations LLC |
| | Kingston Operations LLC |
| 5. | Jefferson Operations LLC |
| 6. | 369 Gates Operations LLC |
| 7. | 853 Lexington Operations LLC |
| 8. | 945 Park Place Operations LLC |
| 9. | 1078 Dekalb Operations LLC |
| 10. | 618 Lafayette Operations LLC |
| 11. | 74 Van Buren Operations LLC |
| 12. | 325 Franklin Operations LLC |
| 13. | 348 St Nicholas Operations LLC |
| 14. | 760 Willoughby Operations LLC |
| 15. | Slope Equities Operations LLC |
| 16. | 454 Central Avenue Operations LLC |
| 17. | 855 Dekalb Avenue Operations LLC |
| 18. | Willoughby Estates Operations LLC |
| 19. | 73 Empire Development Operations LLC |
| 20. | 980 Atlantic Holdings Operations LLC |
| 21. | 720 Livonia Operations LLC |
| 22. | 8 Maple Avenue Operations LLC |
| 23. | 1301 Putman Operations LLC |

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CERTIFICATION OF SERVICE

I, Yitzchak Eliezer Soloveichik, hereby certify that I caused a true and correct copy of

the foregoing document to be served electronically upon the parties registered for electronic

service in this action through the Court's CM/ECF system.

By: /s/ Yitzchak Eliezer Soloveichik

Yitzchak Eliezer Soloveichik

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